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Telephone: (313) 226-9562

Special Agent:

Bryan Drake

Telephone: (414) 397-1264

AO 108 (Rev. 06/09) Application for a Warrant to Seize Property Subject to Forfeiture

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

In the Matter of the Seizure of
(Briefly describe the property to be seized)All funds on deposit in Citizens Bank Account Number
453351-250-9 as further described on Attachment A

Case No.

5:20-mc-50217-1

Judge: Levy, Judith E.

Filed: 2/11/2020

SEALED MATTER (LH)

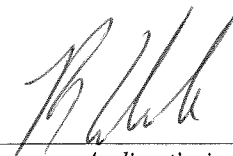
APPLICATION FOR A WARRANT
TO SEIZE PROPERTY SUBJECT TO FORFEITURE

I, a federal law enforcement officer or attorney for the government, request a seizure warrant and state under penalty of perjury that I have reason to believe that the following property in the Eastern District of Michigan is subject to forfeiture to the United States of America under U.S.C. §
See Below (describe the property):

21 USC § 853(p) -- All funds on deposit in Citizens Bank Account Number 453351-250-9 as further described on Attachment A

The application is based on these facts:

See Attached Affidavit

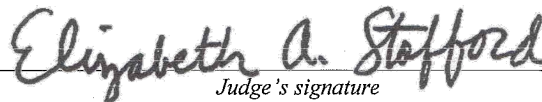
☐ Continued on the attached sheet.


Applicant's signature

FBI SA Bryan Drake

Printed name and title

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: February 11, 2020


Judge's signature

City and state: Detroit, MI

Elizabeth A. Stafford

U. S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF SEIZURE WARRANTS

I, Bryan Drake, Special Agent for the Federal Bureau of Investigation, being duly sworn, depose and state as follows:

This affidavit is in support of seizure of approximately \$300,000 as substitute property to satisfy a forfeiture money judgment entered against Defendant Mohamad Ali Makki in the amount of \$2,388,810.04 by U.S. District Court Judge Linda V. Parker on September 13, 2019. (19-cr-20176, Dkt. No. 73).

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), duly appointed according to law and acting as such, and have been employed as such since January 2008. As a Special Agent in the FBI, I have received general law enforcement training at the FBI Academy, as well as specialized training on the subjects of health care fraud, money laundering and telephone analysis from the FBI, and I have been personally involved in investigations concerning health care fraud, prescription drug diversion and methods used to finance and conceal the profits of those operations. I have interviewed numerous self-proclaimed drug users, medical doctors, and owners and employees of medical clinics. I have investigated and conducted surveillance on numerous doctors, pharmacies and prescription drug dealers. I have consulted with agents and officers of numerous

federal, state, and local agencies in gaining an understanding of current trends in the diversion of prescription drugs and health care fraud. I am currently assigned to the Detroit division of the FBI and my duties include investigating health care fraud and prescription drug diversion.

PURPOSE OF THE AFFIDAVIT

2. This Affidavit is submitted in support of an Application seeking authorization to seize funds on deposit in the following bank account (**Target Funds**), as described:

A. **All funds on deposit in Citizens Bank Account No. 453351-250-9, held in the name of Machaal Dib-Chahrour.**

3. The **Target Funds** (approximately \$300,000) are monies belonging to Defendant Mohamad Ali Makki and transferred into Citizens Bank Account No. 453351-250-9 9 after his indictment in *U.S. v. Makki, et al.*, 19-cr-20176 (E.D. Mich.). The bank account is held by Defendant Makki's mother.

4. The Target Funds constitute substitute property that may be seized for the purpose of satisfying a \$2,388,810.04 forfeiture money judgment entered against Defendant Makki (Dkt. No. 73). The money judgment represents the amount of proceeds Defendant Makki obtained as a result of his participation in a conspiracy to commit health care fraud in violation of 18 U.S.C. § 1349, to which he has pleaded guilty (Dkt. No. 69). The fraud scheme resulted in over \$8 million in Medicare funds being fraudulently reimbursed to LifeCare Pharmacy of

Michigan between January 2010 and January 2018, at which Defendant Makki was the Pharmacist-In-Charge.

5. This affidavit sets forth the facts and law sufficient to establish a basis for the seizure of **Target Funds** as substitute property to satisfy the forfeiture money judgment.

6. As discussed herein, the statements in this affidavit are based upon information I learned during the investigation, including information provided to me by other law enforcement agents and my experience and background as an FBI Special Agent. Since this affidavit is being submitted for the limited purpose of supporting the seizure of **Target Funds**, I have only included those facts sufficient to establish the basis for seizure.

APPLICABLE RULES AND STATUTES

7. Fed. R. Crim. P. 32.2(e)

(1) On the government's motion, the court may at any time enter an order of forfeiture or amend an existing order of forfeiture to include property that:

(B) is substitute property that qualifies for forfeiture under an applicable statute.

8. 18 U.S.C. § 982(a)(7) *Criminal Forfeiture*

The Court, in imposing sentence on a person convicted of a Federal health care offense, shall order the person to forfeit property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense.

9. 21 U.S.C. § 853(p)(2) sets forth that “the court shall order the forfeiture of any other property of the defendant [i.e. substitute]” up to the value of the forfeitable property, so long as the forfeitable property, as a result of any act or omission of the defendant –

- A. cannot be located upon the exercise of due diligence;
- B. has been transferred or sold to, or deposited with, a third party;
- C. has been placed beyond the jurisdiction of the court;
- D. has been substantially diminished in value; or
- E. has been commingled with other property which cannot be divided without difficulty.

21 U.S.C. § 853(p)(1).

PROCEDURAL HISTORY

10. A grand jury in the Eastern District of Michigan returned a second superseding indictment against four individuals, including Mohamad Ali Makki, on May 14, 2019, finding probable cause that Defendant Makki engaged in a conspiracy to commit health care fraud, in violation of 18 U.S.C. § 1349 (Count 1), and health care fraud, in violation of 18 U.S.C. § 1347 (Counts 2-11). (Case No. 19-cr-20176, Dkt. No. 48).

11. On or about September 3, 2019, Defendant Makki pleaded guilty to Count 1 of the Second Superseding Indictment, which charges him with conspiracy

to commit health care fraud, in violation of Title 18, United States Code, Section 1349. (Case No. 19-cr-20176, Dkt. No. 69).

12. Defendant Makki agreed in his guilty plea to the entry of a forfeiture money judgment in the amount of \$2,388,810.04 against him and in favor of the United States, representing the total value of property subject to forfeiture for the Defendant's violation of Count 1 of the Second Superseding Indictment. *Id.*

13. Defendant Makki also agreed in his plea agreement that the forfeiture money judgment may be satisfied from any property owned by him or under his control, and agreed that to satisfy the money judgment any assets he owned, or may later acquire, may be forfeited as substitute assets under 21 U.S.C. § 853(p)(2). *Id.*

14. In his plea agreement, Defendant Makki also expressly waived and relinquished any rights he may have to otherwise oppose the forfeiture of substitute assets under 21 U.S.C. § 853(p)(1). *Id.*

15. On September 13, 2019, the Court entered a Stipulated Preliminary Order of Forfeiture, signed and agreed to by Defendant Makki and his counsel, granting a \$2,388,810.04 forfeiture money judgment against Defendant Makki and in favor of the United States. (Case No. 19-cr-20176, Dkt. No. 73).

16. The Stipulated Preliminary Order of Forfeiture ordered that “[t]o satisfy the money judgment, any assets that the Defendant has now or may later

acquire may be forfeited as substitute assets under 21 U.S.C. § 853(p)(2).” *Id.*

17. The Stipulated Preliminary Order of Forfeiture became “final as to the Defendant at the time of entry.” *Id.*

18. On February 7, 2020, the Court issued an order denying Defendant Makki’s emergency motion for a briefing scheduling concerning whether funds identified by Defendant Makki (i.e. the **Target Funds**) needed to be turned over to the United States as substitute property to satisfy the money judgment. (19-cr-20176, Dkt. No. 117). In its order, the Court stated:

Pursuant to the referenced language in the plea agreement, the money Defendant admittedly transferred to his mother’s account while this action was pending [i.e. **Target Funds**] is subject to forfeiture regardless of whether the funds are directly or indirectly traceable to Defendant’s conspiracy to commit health care and wire fraud.

Id.

19. The **Target Funds**, are the funds referenced in the Court’s order. On January 11, 2020, in support of his contention that he had only transferred \$450,000 to his mother, rather than \$600,000, Defendant Makki filed a declaration from his brother (Mehdi Makki) and bank records on the public docket (19-cr-20176, Dkt. No. 101-2). The declaration and bank records show that **Target Funds** are on deposit in Citizens Bank Account No. 453351-250-9. Those declaration and bank records are attached as Exhibit 1 to this affidavit.

BASIS FOR SEIZURE OF SUBSTITUTE ASSETS

20. The Court has entered a money judgment in the amount of \$2,388,810.04, equal to the amount Defendant Makki obtained as a result of his health care fraud conspiracy in violation of 18 U.S.C. § 1349.

21. The **Target Funds** are subject to seizure as substitute property, pursuant to 21 U.S.C. § 853(p).

22. A review of Defendant Makki's bank accounts, into which he obtained fraud proceeds, shows that these funds were either dissipated prior to indictment, or seized by the United States. The amounts forfeiture from Defendant Makki to-date do not satisfy the forfeiture money judgment entered against him.

23. The amount seized and forfeited to the United States is approximately \$547,275.95, substantially less than the amount obtained by the Defendant as a result of the fraud scheme.

24. After a review of Defendant Makki's assets, he does not possess property traceable to his fraud that can be forfeited to satisfy the money judgment.

CONCLUSION

25. I am aware that Title 18 U.S.C. § 981(b)(3) authorizes the issuance of a seizure warrant in any district in which a forfeiture action against the property

may be filed under 28 U.S.C. § 1355(b), and may be executed in any district in which the property is found.

26. I am aware that Title 28 U.S.C. § 1355(b) authorizes the filing of a forfeiture action in the District Court for the district in which any of the action or omission giving rise to the forfeiture occurred.

27. The **Target Funds** are subject to seizure as substitute property to satisfy the \$2,388,810.04 forfeiture money judgment entered against Defendant Makki.

28. Your affiant requests that for the following account, a warrant be issued to seize, for purpose of criminal forfeiture, the specified amounts from the following accounts:

- a. All funds on deposit in Citizens Bank Account No. 453351-250-9, held in the name of Machaal Dib-Chahrour.

29. Affiant requests that Citizens Bank be instructed to provide federal agents with the current account balance upon seizure, as follows:

The financial institution upon which this seizure warrant has been served is instructed to provide federal agents authorized to seize the funds with the current balance in each account upon service of the seizure warrant and at the request of the federal agents authorized to seize the funds.

30. Affiant further requests that the Court warrant and authorize the FBI to effect seizure of the account to be pooled for fourteen days to allow for the

collection of reimbursements obtained pursuant to the fraud scheme set forth herein that have been processed but not paid, as follows:

Citizens Bank is further instructed to allow incoming funds but not allow funds to be withdrawn, transferred, wired, routed or otherwise disbursed by or to any persons (other than the federal agents authorized to seize the funds) for a period of fourteen (14) days from the issuance of the warrant. Bank of America is instructed to disburse funds to federal agents and without further order of the court.

REQUEST FOR SEALING

31. It is respectfully requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the application and search warrant. I believe that sealing this document is necessary because the items and information to be seized are relevant to an ongoing investigation into the criminal organizations, as not all of the targets of this investigation will be searched at this time. Premature disclosure of the contents of this affidavit and related documents may have a significant and negative impact on the continuing investigation and may severely jeopardize its effectiveness.

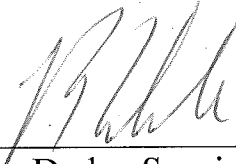
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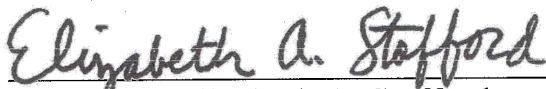
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Bryan Drake, Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my
presence and/or by reliable electronic means.



Honorable Elizabeth A. Stafford
United States Magistrate Judge

Dated: February 11, 2020

Exhibit 1

Exhibit B

AFFIDAVIT OF MR. MEHDI MAKKI

I, Mehdi Makki, do depose and state under the penalty of perjury, the following:

1. I, Mehdi Makki
2. I have personal knowledge of the facts alleged herein.
3. I am competent and able to testify if called to do so.
4. I am the brother of Mohamad Makki, a Defendant in case no. 19-20176-2,
here in the Eastern District of Michigan.
5. I am aware that there were discussions in that case about an amount that was
transferred into my mother's bank account.
6. That amount was \$450,000.
7. The transfer, as I understood it, was done with the full knowledge and
understanding of the government, through its attorneys on my brother's case,
at the time.
8. Attached at Exhibit A, Bank Records, are bank statements from my mother's
bank account.
9. The monies withdrawn during the period was used for payments except
which \$1,500 are still available.
10. I hereby swear that that report, attached at Exhibit B, is true and accurate to
the best of my knowledge.

11. Over the course of several months, the respective amount withdrawn out of my mother's account and put it into my account, and paid the expenses listed on the expense report (Exhibit B) from my account.
12. An additional \$10,000 was paid to Ayad Law, PLLC for its services in my brother Mohamed's legal case.
13. I am sorry that it took so long to collect these documents. I suffer from a slight mental deficiency and my brother was helping take care of me when he was not in custody.
14. I am confident in my brother, Mohamed's, character that he will not betray my uncle and shame our family by attempting to flee justice.
15. I also vow to do everything in my power to ensure that my brother, Mohamed Makki, appears at all future hearings.
16. I will be in Court on Monday, January 13, 2020 to attest to the veracity of this affidavit.

FURTHER AFFIANT SAYETH NOT

Dated this Jan day of 11 2020.

Makki
(Signature of Affiant)

MAKKI, Mehdi
(Printed name of Affiant)

Exhibit A



1-877-242-7837

Call Citizens' PhoneBank anytime for account information,
current rates and answers to your questions.

US102 BR828

MACHAAL DIB-CHAHROUR
2021 N GULLEY RD
DEARBORN HEIGHTS MI 48127-3439

Checking Account Statement

1 OF 1

Beginning June 03, 2019
through June 17, 2019

Checking

SUMMARY

Balance Calculation

Previous Balance	.00
Checks	.00 -
Withdrawals & Debits	.00 -
Deposits & Credits	450,080.00 +
Current Balance	450,080.00 =

MACHAAL DIB-CHAHROUR
TTEE FOR TARIK MAKKI
One Deposit Checking
453351-250-9

The monthly maintenance fee of \$9.99 will be waived if at least 1 deposit is posted to your account before the end of your statement period.
Your account had at least 1 deposit posted during this statement period.
Your next statement period will end on July 16, 2019.

TRANSACTION DETAILS

Deposits & Credits

Date	Amount	Description
06/03	80.00	Deposit
06/07	450,000.00	Deposit

Previous Balance
.00

Daily Balance

Date	Balance	Date	Balance
06/03	80.00	06/07	450,080.00

Total Deposits & Credits
450,080.00
 Current Balance
450,080.00

NEWS FROM CITIZENS

--Saving can be easier than you think! With small changes in your spending, your savings can really add up! Packing your lunch 3x per week vs. eating out (on average a \$10 expense) could add up to \$1,560 in savings at the end of one year. Make a goal to pack your lunch a few times a week and set up an automatic transfer to your savings for the amount you saved and watch your savings add up! For more information visit a branch or call 888-821-3900. Member FDIC.

--Still writing checks for your bills? Try Bill Pay through Online Banking to quickly and easily pay your bills and manage your accounts. Plus, view check images in Online Banking as soon as they are paid to stay on top of your finances.



1-877-242-7837

Call Citizens' PhoneBank anytime for account information, current rates and answers to your questions.

US102 BR828

MACHAAL DIB-CHAHROUR
2021 N GULLEY RD
DEARBORN HEIGHTS MI 48127-3439

Checking Account
Statement

1 OF 1

Beginning June 18, 2019
through July 16, 2019

Checking

SUMMARY

Balance Calculation

Previous Balance	450,080.00
Checks	.00 -
Withdrawals & Debits	15,019.99 -
Deposits & Credits	.00 +
Current Balance	435,060.01 =

The monthly maintenance fee of \$9.99 will be waived if at least 1 deposit is posted to your account before the end of your statement period.
Your next statement period will end on August 15, 2019.

MACHAAL DIB-CHAHROUR
TREE FOR TARIK MAKKI
One Deposit Checking
453351-250-9

TRANSACTION DETAILS

Withdrawals & Debits

Other Withdrawals & Debits

Date	Amount	Description
06/21	15,010.00	Withdrawal
07/16	9.99	Monthly Maintenance Fee

Previous Balance

450,080.00

Total Withdrawals & Debits

15,019.99

Current Balance

435,060.01

Daily Balance

Date	Balance	Date	Balance
06/21	435,070.00	07/16	435,060.01

NEWS FROM CITIZENS

--Why wait for a statement to see your banking activity? Download our Mobile Banking App today to manage your money when it is convenient for you. *Wireless carrier charges may apply.

--Saving can be easier than you think! With small changes in your spending, your savings can really add up! Packing your lunch 3x per week vs. eating out (on average a \$10 expense) could add up to \$1,560 in savings at the end of one year. Make a goal to pack your lunch a few times a week and set up an automatic transfer to your savings for the amount you saved and watch your savings add up! For more information visit a branch or call 888-821-3900. Member FDIC.



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MACHAAL DIB-CHAHROUR
2021 N GULLEY RD
DEARBORN HEIGHTS MI 48127-3439

Checking Account Statement

1 OF 2

Beginning July 17, 2019
 through August 15, 2019

Checking

SUMMARY

Balance Calculation

Previous Balance 435,060.01
 Checks 5,000.00 -
 Withdrawals & Debits 11,719.72 -
 Deposits & Credits .00 +
Current Balance 418,340.29 =

The monthly maintenance fee of \$9.99 will be waived if at least 1 deposit is posted to your account before the end of your statement period.
 Your next statement period will end on September 17, 2019.

MACHAAL DIB-CHAHROUR
TTEE FOR TARIK MAKKI
One Deposit Checking
453351-250-9

TRANSACTION DETAILS

Checks * There is a break in check sequence

Check #	Amount	Date	Check #	Amount	Date
4212991	5,000.00	08/05			

Previous Balance

435,060.01

Total Checks

5,000.00

Withdrawals & Debits

Other Withdrawals & Debits

Date	Amount	Description
08/01	8,010.00	Withdrawal
08/12	500.00	Chase Credit Crd Epay 190810 4248264509
08/12	85.00	Chase Credit Crd Epay 190810 4248263369
08/13	1,137.76	Bmwfinancial Svs Bmwfs Pymt 190811 253789343
08/13	1,137.76	Bmwfinancial Svs Bmwfs Pymt 190811 253789588
08/13	839.21	Colonial Savings Colonial S 081319 0045003622
08/15	9.99	Monthly Maintenance Fee

Total Withdrawals & Debits

11,719.72

Current Balance

418,340.29

Daily Balance

Date	Balance	Date	Balance	Date	Balance
08/01	427,050.01	08/12	421,465.01	08/15	418,340.29
08/05	422,050.01	08/13	418,350.28		

NEWS FROM CITIZENS

--Effective 10/5/2019, the Foreign Transaction fee for all debit card transactions made outside the United States and US Territories will be 3%. For any questions regarding this



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Checking Account
Statement

2 OF 2

Beginning July 17, 2019
through August 15, 2019

Checking continued from previous page

NEWS FROM CITIZENS (continued)

change, please contact us at the number on the back of your debit card.

--Saving can be easier than you think! With small changes in your spending, your savings can really add up! Packing your lunch 3x per week vs. eating out (on average a \$10 expense) could add up to \$1,560 in savings at the end of one year. Make a goal to pack your lunch a few times a week and set up an automatic transfer to your savings for the amount you saved and watch your savings add up! For more information visit a branch or call 888-821-3900. Member FDIC.

--Still writing checks for your bills? Try Bill Pay through Online Banking to quickly and easily pay your bills and manage your accounts. Plus, view check images in Online Banking as soon as they are paid to stay on top of your finances.

MACHAAL DIB-CHAHROUR
TTEE FOR TARIK MAKKI
One Deposit Checking
453351-250-9



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Checking Account
Statement

1 OF 2

Beginning August 16, 2019
through September 17, 2019

US102 BR828

MACHAAL DIB-CHAHROUR
2021 N GULLEY RD
DEARBORN HEIGHTS MI 48127-3439

Checking

SUMMARY

Balance Calculation

Previous Balance	418,340.29
Checks	.00 -
Withdrawals & Debits	35,479.71 -
Deposits & Credits	.00 +
Current Balance	382,860.58 =

The monthly maintenance fee of \$9.99 will be waived if at least 1 deposit is posted to your account before the end of your statement period.

Your next statement period will end on October 16, 2019.

MACHAAL DIB-CHAHROUR
TEE FOR TARIK MAKKI
One Deposit Checking
453351-250-9

Previous Balance

418,340.29

TRANSACTION DETAILS

Withdrawals & Debits

Other Withdrawals & Debits

Date	Amount	Description
08/19	3,083.87	Roundpoint MT S Roundpoint 190816 2003321557
08/23	11,010.00	Withdrawal
08/27	1,528.09	Roundpoint MT S Roundpoint 190826 2003321557
09/03	900.00	Chase Credit Crd Epay 190902 4280924074
09/03	500.00	Chase Credit Crd Epay 190902 4280923064
09/10	5,000.00	Withdrawal
09/10	300.00	Cardmember Serv Elect Pymt 190909 *****0223
09/13	1,137.76	Bmwfinancial Svs Bmwfs Pymt 190912 255284388
09/16	2,000.00	Chase Credit Crd Epay 190913 4300765285
09/17	10,010.00	Withdrawal
09/17	9.99	Monthly Maintenance Fee

Total Withdrawals & Debits

35,479.71

Current Balance

382,860.58

Daily Balance

Date	Balance	Date	Balance	Date	Balance
08/19	415,256.42	09/03	401,318.33	09/16	392,880.57
08/23	404,246.42	09/10	396,018.33	09/17	382,860.58
08/27	402,718.33	09/13	394,880.57		

NEWS FROM CITIZENS

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MACHAAL DIB-CHAHROUR
2021 N GULLEY RD
DEARBORN HEIGHTS MI 48127-3439

Checking Account
Statement

1 OF 1

Beginning September 18, 2019
through October 16, 2019

Checking

SUMMARY

Balance Calculation

Previous Balance	382,860.58
Checks	.00 -
Withdrawals & Debits	56,819.99 -
Deposits & Credits	.00 +
Current Balance	326,040.59 =

The monthly maintenance fee of \$9.99 will be waived if at least 1 deposit is posted to your account before the end of your statement period.

Your next statement period will end on November 18, 2019.

MACHAAL DIB-CHAHROUR
TTEE FOR TARIK MAKKI
One Deposit Checking
453351-250-9

Previous Balance
382,860.58

TRANSACTION DETAILS

Withdrawals & Debits

Other Withdrawals & Debits

Date	Amount	Description
09/23	300.00	Chase Credit Crd Epay 190922 4313108749
10/04	55,510.00	Withdrawal
10/07	700.00	Chase Credit Crd Epay 191003 4331199712
10/07	300.00	Chase Credit Crd Epay 191003 4331201225
10/16	9.99	Monthly Maintenance Fee

Total Withdrawals & Debits
56,819.99
Current Balance
326,040.59

Daily Balance

Date	Balance	Date	Balance	Date	Balance
09/23	382,560.58	10/07	326,050.58	10/16	326,040.59
10/04	327,050.58				

NEWS FROM CITIZENS

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MACHAAL DIB-CHAHROUR
2021 N GULLEY RD
DEARBORN HEIGHTS MI 48127-3439

Checking Account
Statement

1 OF 1

Beginning October 17, 2019
through November 18, 2019

Checking

SUMMARY

Balance Calculation

Previous Balance 326,040.59
Checks .00 -
Withdrawals & Debits 7,830.52 -
Deposits & Credits .00 +
Current Balance 318,210.07 =

The \$9.99 monthly maintenance fee is waived when you make at least 1 deposit that is posted before the end of your statement period.
No deposit made.

Your next statement period will end on December 16, 2019.

MACHAAL DIB-CHAHROUR
TTEE FOR TARIK MAKKI
One Deposit Checking
453351-250-9

TRANSACTION DETAILS

Withdrawals & Debits

Other Withdrawals & Debits

Date	Amount	Description
10/22	1,000.00	Chase Credit Crd Epay 191021 4358850232
11/01	1,137.76	Bmwfinancial Svs Bmwfs Pymt 191031 257758224
11/05	27.25	Deluxe Check Check/Acc. 191101
11/08	5,467.60	Safeco Ins. CO. Tel Pymnt 191108 72113113148
11/18	187.92	Huntington Card Payment 191118 C 98334975
11/18	9.99	Monthly Maintenance Fee

Previous Balance

326,040.59

Total Withdrawals & Debits

7,830.52

Current Balance

318,210.07

Daily Balance

Date	Balance	Date	Balance	Date	Balance
10/22	325,040.59	11/05	323,875.58	11/18	318,210.07
11/01	323,902.83	11/08	318,407.98		

NEWS FROM CITIZENS

--Saving can be easier than you think! With small changes in your spending, your savings can really add up! Packing your lunch 3x per week vs. eating out (on average a \$10 expense) could add up to \$1,560 in savings at the end of one year. Make a goal to pack your lunch a few times a week and set up an automatic transfer to your savings for the amount you saved and watch your savings add up! For more information visit a branch or call 888-821-3900. Member FDIC.

--Why wait for a statement to see your banking activity? Download our Mobile Banking App today to manage your money when it is convenient for you. *Wireless carrier charges may apply.

Docket Text:

Minute Entry for proceedings before District Judge Linda V. Parker: Nebbia Hearing on 12/18/2019, as to Mohamad Ali Makki. Disposition: Nebbia hearing continued until 1/13/20 at 11:00 am. Prior to the hearing, counsel for Defendant will provide to the Government and the Court (1) the documentation needed to trace the source of funds Mr. Wahid Makki used to purchase the commercial building he is offering to put up as collateral for Defendant's bond and (2) documentation tracing the \$400,000 - \$600,000 Defendant transferred to an account in his mother's name (e.g., the status of the account and the funds). The Government agrees not to act on its notice of intent to withdraw the Rule 11 Plea Agreement until counsel for Defendant and the Government meet and confer. (Court Reporter: Jodi Matthews) (Defendant Attorney: Jeffrey G. Collins, Mazen A. Ghaith, Nabih H. Ayad) (AUSA: Philip A. Ross) (RLou)

2:19-cr-20176-LVP-EAS United States of America v. Makki et al
Status Conference (No document attached)

Docket Text:

Minute Entry for proceedings before District Judge Linda V. Parker: Status Conference as to Mohamad Ali Makki held on 12/18/2019. (Court Reporter: None Present, Not on the Record) (Defendant Attorney: Jeffrey G. Collins, Mazen A. Ghaith, Nabih H. Ayad) (AUSA: Philip A. Ross) (RLou)

Exhibit B

ACTIVITY

- 565 TMOBILE / TRAVEL / SECURUS
- 3475 WU > T.M.
- 1395 GROCERY/ WALMART / MEDS/ KROGER/ DAD
- 2030 TMOBILE/ GROCERY/ TRAVEL/ GAS
- 2820 DELTA/ MEDBILL/ PHARMACY / WIRELESS / GAS
- 1585 ACCOUNTANT / ALARM/ MISC
- 1085 LEGAL / WATER / RFS MIDLAND / SECURUS / CVS
- 915 SECURUS / WIRELESS / COMCAST / GAS
- 2000 SECURUS / DTE / GROCERY / WALGREENS
- 915 DTE / SECURUS / CORR LINKS / WALGREENS / MEDS
- 1650 GREENLAND / GAS / GROCERY
- 960 MEIJER / GROCERY / COMAST
- 1485 WIRELESS / CALL FWD / GREENLAND
- 19420 TAX X3 UNITS / COMCAST / TRAVEL / CALLS
- 1330 MEIJER / GROCERY / WATER BILL
- 2925 TAXES / DEED / BIN / ACOUNTANT /
- 5420 DIFFERED ACT
- 2550 WU > MOM >> LEB
- 300 WU > INMATE
- 1000 CREDIT CARD BILL
- 820 SEPT SECURUS / H20 WIRELESS / DTE
- 2025 AUG GAS / WALGREENS / BILLS
- 915 SECURUS / TRANSFERS
- 7500 PAYMENTS / CASH
- 5000 TRANSFERRED / COVER EXPENSES / CASH
- 3000 MOM >> MEHDI
- 220 TRU GREEN
- 1000 SHADIA
- 760 HUNT ACT
- 980 DISCOVER
- 1000 MAINTENCE / MEDICAL RELATED
- 2515 COLONIAL / 3 PAYMENTS X838
- 3174 PRIMELENDING
- 19470 CLOSING - HOUSE

ATTACHMENT A

- All funds on deposit in Citizens Bank Account Number 453351-250-9 with permission to serve the warrant electronically followed by original service

The financial institution upon which this seizure warrant has been served is instructed to provide federal agents authorized to seize the funds with the current balance in each account upon service of the seizure warrant and at the request of the federal agents authorized to seize the funds.

Citizens Bank is further instructed to allow incoming funds but not allow funds to be withdrawn, transferred, wired, routed or otherwise disbursed by or to any persons (other than the federal agents authorized to seize the funds) for a period of fourteen (14) days from the issuance of the warrant. Bank of America is instructed to disburse funds to federal agents and without further order of the court.

AO 109 (Rev. 11/13) Warrant to Seize Property Subject to Forfeiture Special Agent: AUSA: Shankar Ramamurthy Telephone: (313) 226-9562
Bryan Drake Telephone: (414) 397-1264

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

In the Matter of the Seizure of)	
(Briefly describe the property to be seized))	5:20-mc-50217-1
All funds on deposit in Citizens Bank Account Number)	Case No. Judge: Levy, Judith E.
453351-250-9 as further described on Attachment A)	Filed: 2/11/2020
)	SEALED MATTER (LH)

WARRANT TO SEIZE PROPERTY SUBJECT TO FORFEITURE

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests that certain property located in the Eastern District of Michigan be seized as being subject to forfeiture to the United States of America. The property is described as follows:

All funds on deposit in Citizens Bank Account Number 453351-250-9 as further described on Attachment A with permission to serve the warrant electronically followed by original service

I find that the affidavit(s) and any recorded testimony establish probable cause to seize the property.

YOU ARE COMMANDED to execute this warrant and seize the property on or before February 24, 2020

(not to exceed 14 days)

☒ in the daytime 6:00 a.m. to 10:00 p.m. ☐ at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must also give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

An officer present during the execution of the warrant must prepare, as required by law, an inventory of any property seized and the officer executing the warrant must promptly return this warrant and a copy of the inventory to the presiding United States Magistrate Judge on duty (United States Magistrate Judge).

☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (check the appropriate box)

☐ for days (not to exceed 30) ☐ until, the facts justifying, the later specific date of .

Date and time issued: February 11, 2020 10:09 am

Elizabeth A. Stafford
Judge's signature

City and state: Detroit, MI

Elizabeth A. Stafford

U. S. Magistrate Judge

Printed name and title

AO 109 (Rev. 11/13) Warrant to Seize Property Subject to Forfeiture (Page 2)

Return

Case No.:	Date and time warrant executed:	Copy of warrant and inventory left with:
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Inventory made in the presence of:

Inventory of the property taken:

Certification

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: _____

*Executing officer's signature*_____
Printed name and title